

COMMENT SET 14: NICOLE STRASBURG

(09/13/2006) Peter Strait - Venoco expansion

Page 1

From: Nicole Strasburg <nicolestrasburg@cox.net>
To: <straitp@slc.ca.gov>
Date: 09/13/2006 10:42 AM
Subject: Venoco expansion

California State Lands Commission

100 Howe Ave., Suite 100 South.

Sacramento, CA 95825

To Whom It May Concern:

Any expansion of the Venoco Inc. oil barge operation off the shore of Goleta and Ellwood Beach and Mesa, a protected area, must be prohibited. Application for renewal of licensing should be summarily denied. In fact, Venoco's crude oil recovery operations with the aging barge Jovalan should be curtailed under the laws of California due to the existence immediately adjoining of critical habitat for the Western snowy plover, a threatened species, as well as the total lack of any full environmental review of this facility, which you have extended annual leases to regardless of its impact for over 15 years. California deserves better stewardship than this.

Two years ago, wildfires north of San Diego demonstrated how sensitive our threatened species are by a single environmental accident. Two species of butterflies were rendered extinct by several small fires, so curtailed were their habitats. When the fires came, scientists were amazed and shocked to find the butterflies were history.. A similar loss could occur in our region for the Western snowy plover with a single oil spill of the size of our last large spill. Critical habitat must be protected beyond what the commission is now enforcing. "General renewing of leases" without an EIS for this operation is unacceptable. Increasing the amount of oil handled by this operation significantly increases risk to the endangered plover. Allowing the continuing use of a decrepit, patched and unseaworthy barge is also not smart on the part of the commission. Trucking the oil in 25 daily trips overland is preferable for the plover's environment. Closing the facility entirely until a complete EIS is written--taking into account science's evolving understanding of isolated, critical habitat of endangered and threatened species--is only prudent.

NS-1

Dinosaur technology is unacceptable in the 21st century in California. We solicit your protection and thank you for your attention.

Nicole Strasburg

Nicole Strasburg
Contemporary Landscape Painting

correspondence:
Box 61803
Santa Barbara, CA 93160

(09/13/2006) Peter Strait - Venoco expansion

Page 2

ns@nicolestrasburg.com
<http://www.nicolestrasburg.com>

RESPONSE TO COMMENT SET 14: NICOLE STRASBURG

1 NS-1 Potential impacts associated to the Western snowy plover from a
2 potential oil spill were evaluated in the DEIR, with impacts found to be
3 significant. Numerous mitigation measures were included in the DEIR to
4 protect the Western snowy plover and its habitat to the maximum extent
5 feasible. The DEIR is the California equivalent of a Federal
6 Environmental Impact Statement (EIS) and covers all analyses that
7 would be required in an EIS. While the U.S. Army Corps of Engineers
8 (USACoE) has jurisdiction over the permitting of the offshore facilities,
9 no actions are proposed as part of the proposed Project that would
10 result in a need for a new permit from the USACoE. Therefore, an EIS
11 would not be required.